

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

LYDIA DION,

Defendant.

Case No. 1:22-MJ-105

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Michael Berry, being duly sworn, depose and state the following:

1. I am a special agent for the United States Postal Service, Office Inspector General.

I have held this position since 2011.

2. This affidavit is submitted in support of a criminal complaint and arrest warrant for Lydia DION, who on or about March 15, 2021, in Fairfax County, Virginia, within the Eastern District of Virginia, LYDIA DION, a United States Postal Service employee, stole, abstracted, and removed an article and thing contained in a letter and mail, which had come into her possession intended to be conveyed by mail, and carried and delivered by mail, in violation of Title 18 U.S.C. § 1709.

3. The facts and information contained in this affidavit are based on my training and experience, personal knowledge, and observations during the course of this investigation, as well as the observations of other officers and witnesses.

4. This affidavit is submitted for the limited purpose of obtaining a criminal complaint and arrest warrant. It is not intended to include each and every fact and matter observed by me or known to the United States.

### **SUMMARY OF FACTS TO SUPPORT PROBABLE CAUSE**

5. On January 12, 2021, I received information from a special agent of the Federal Bureau of Investigations (FBI) that DION's fingerprints were found on a stolen check which was recovered during an ongoing FBI investigation.

6. On March 15, 2021, investigators conducted an operation to determine whether DION was stealing mail.

7. During the operation, DION failed to deliver a test piece of mail and also did not return the mail to the Fairfax Post Office at the end of her shift.

8. As DION was leaving the Fairfax Post Office that day, she agreed to speak to myself and another investigator.


9. During the interview, I asked for consent to search the bookbag DION had in her possession. DION stated she consented to a search of her bookbag but did not want to sign a consent form. Investigators found 61 pieces of mail in DION's bookbag, none of which belonged to DION.

10. DION stated she had also previously stolen greeting cards from the mail containing Target and Amazon gift cards. She believed the gift cards were valued at 50 dollars each and estimated that she had stolen 100 dollars in U.S. currency from the mail.

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11. Based on my training, experience, and given the aforementioned facts, I submit that there is probable cause to believe that on March 15, 2021, in Fairfax County, Virginia, within the Eastern District of Virginia, LYDIA DION, a United States Postal Service employee, stole, abstracted, and removed an article and thing contained in a letter and mail, which had come into her possession intended to be conveyed by mail, and carried and delivered by mail, in violation of Title 18 U.S.C. § 1709.

Respectfully submitted,



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Michael Berry  
Special Agent  
United States Postal Service Office of the  
Inspector General

Attested to by the applicant in accordance  
with the requirements of Fed. R. Crim. P. 4.1  
by telephone on May 5, 2022.

John F. Anderson

Digitally signed by John F.  
Anderson  
Date: 2022.05.05 15:21:23 -04'00'

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The Honorable John F. Anderson  
United States Magistrate Judge  
Alexandria, Virginia